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May 22, 2023

VIA ECF

The Honorable Brian M. Cogan
United States District Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Force, et al. v. Qatar Charity, et al.*, No. 1:20-cv-2578—
Letter Regarding Supplemental Authority**

Dear Judge Cogan:

On behalf of defendants Qatar Charity, Qatar National Bank, and Masraf Al Rayan (“Defendants”), we respectfully write to notify the Court of the following supplemental authority in further support of the Defendants’ motions to dismiss (ECF Nos. 55, 56, 57): *Twitter, Inc. v. Taamneh, et al.*, No. 21-1496, --- S.Ct. ---- (May 18, 2023).

On May 18, 2023, the U.S. Supreme Court issued its decision in *Twitter, Inc. v. Taamneh, et al.*, a case considering the meaning of “aiding and abetting” an act of international terrorism under JASTA. *Twitter, Inc. v. Taamneh, et al.*, No. 21-1496, --- S.Ct. ---- (2023) (holding aiding and abetting an act of international terrorism requires a defendant consciously and culpably participate in the wrongful act giving rise to plaintiffs’ claims). A copy of the decision is attached as **Exhibit A**.

Respectfully submitted,

/s/ John M. Hillebrecht
John M. Hillebrecht

Counsel for Qatar Charity

Encl.

cc: All counsel of record (by ECF)